

64D05-2008-CT-006083

Porter Superior Court 5

Filed: 8/6/2020 11:38 AM

Clerk

Porter County, Indiana

CIRCUIT/SUPERIOR COURT FOR THE COUNTY OF PORTER
STATE OF INDIANA
COURTHOUSE, 16 E. LINCOLNWAY STREET
VALPARAISO, IN 46383
TELEPHONE: 219 465-3450

Jasmail Singh

Plaintiff(s)

VS.

No. _____

John Doe and ANG Transportation, Inc.

Defendant(s)

SUMMONS

The State of Indiana to Defendant: **ANG Transportation, Inc., c/o All American Agents of Process, Daniel Bradford, 11940 Pebblepointe Pass, Carmel, IN 46033**

You have been sued by the person(s) named "plaintiff" in the court stated above.

The nature of the suit against you is stated in the complaint which is attached to this document. It also states the demand which the plaintiff has made and wants from you.

You must answer the complaint in writing, by you or your attorney, within Twenty (20) days, commencing the day after you receive this summons, or judgment will be entered against you for what the plaintiff has demanded. You have twenty-three (23) days to answer if this summons was received by mail. **Such Answer Must Be Made In Court.**

If you have a claim for relief against the plaintiff arising from the same transaction or occurrence, you must assert it in your written answer.

8/6/2020

Date: _____

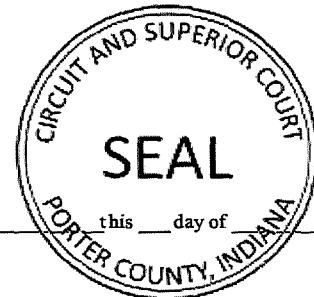
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CLERK, PORTER CIRCUIT COURT

RYAN D. ETTER, #27832-49
ATTORNEY FOR PLAINTIFF
KEN NUNN LAW OFFICE
104 FRANKLIN ROAD
BLOOMINGTON, IN 47404
TELEPHONE: (812)332-9451

ACKNOWLEDGMENT OF SERVICE OF SUMMONS

A copy of the above summons and a copy of the complaint attached thereto were received by me at _____ this ____ day of _____, 2020.



SIGNATURE OF DEFENDANT

PRAECIPE: I designate the following mode of service to be used by the Clerk.

- XX By certified or registered mail with return receipt to above address.
- ☐ By Sheriff delivering a copy of summons and complaint personally to defendant or by leaving a copy of the summons and complaint at his dwelling house or usual place of abode with some person of suitable age and discretion residing therein.
- ☐ By _____ delivering a copy of summons and complaint personally to defendant or by leaving a copy of the summons and complaint at his dwelling house or usual place of abode.
- ☐ By serving his agent as provided by rule, statute or valid agreement, to-wit:

KEN NUNN LAW OFFICE

BY: s/ RYAN D. ETTER
ATTORNEY FOR PLAINTIFF

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Porter County, Indiana

STATE OF INDIANA)
) SS:
COUNTY OF PORTER) CAUSE NO.

JASMAIL SINGH

VS.

JOHN DOE and
ANG TRANSPORTATION, INC.

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, Jasmail Singh, by counsel, Ryan D. Etter of Ken Nunn Law Office, and for his cause of action against the Defendants, John Doe and ANG Transportation, Inc., alleges and states as follows:

STATEMENT AND JURISDICTION

1. This is a clear liability collision in which Defendants' tractor and attached trailer was negligently driven by an unknown defendant, John Doe, causing the tractor and attached trailer to strike the plaintiff, Jasmail Singh, who was a pedestrian. As a result of the incident, Plaintiff has incurred medical expenses, lost wages, and other special expenses in an amount to be proven at trial of this cause.

2. Jurisdiction and venue are appropriate in Porter County, Indiana, as said collision occurred within the boundaries of Porter County, State of Indiana.

FIRST CAUSE OF ACTION

NEGLIGENCE OF JOHN DOE

3. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 2 above as if fully restated verbatim.

4. On or about November 5, 2019 Defendant John Doe negligently drove a tractor-trailer, causing the tractor-trailer to strike the plaintiff, Jasmail Singh, who was a pedestrian.

5. Defendant John Doe had a duty to operate his tractor trailer in a safe and reasonable manner.

6. Defendant John Doe failed in the above mentioned duties and is therefore negligent.

7. Defendant John Doe's negligence was the direct and proximate cause of Plaintiff's injuries.

8. Plaintiff Jasmail Singh's injuries and damages are permanent.

9. As a direct and proximate result of John Doe's negligence, Jasmail Singh has suffered lost wages.

10. Plaintiff, Jasmail Singh, has incurred medical bills for the treatment of his injuries directly resulting from this collision.

11. As a direct and proximate result of John Doe's negligence, Jasmail Singh has experienced physical and mental pain and suffering, lost wages, and has lost the ability to perform usual activities, resulting in a diminished quality of life.

SECOND CAUSE OF ACTION

NEGLIGENCE PER SE OF JOHN DOE

12. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 11 above as if fully restated verbatim.

13. John Doe violated state and federal statutes and regulations including but not limited to Title 9 of the Indiana Code.

14. Defendant John Doe's statutory violations directly and proximately caused Plaintiff's damages and injuries.

15. Defendant John Doe is negligent per se based on these statutory and regulatory violations.

THIRD CAUSE OF ACTION

RESPONDEAT SUPERIOR OF ANG TRANSPORTATION, INC.

16. Plaintiff realleges and incorporates herein by reference paragraphs 1 through 15 above as if fully restated verbatim.

17. Defendant John Doe was the employee, agent, servant, or independent contractor for ANG Transportation, Inc. Accordingly, ANG Transportation, Inc. is vicariously liable for the acts of Defendant John Doe for the causes of action above.

WHEREFORE, the Plaintiff, Jasmail Singh, by counsel Ryan D. Etter of Ken Nunn Law Office, demands judgment against the Defendants, John Doe and ANG Transportation, Inc. for permanent injuries in a reasonable amount to be determined at the trial of this cause, for medical expenses, lost wages, and other special expenses, court costs and all other just and proper relief in the premises.

KEN NUNN LAW OFFICE

BY: s/ Ryan D. Etter
Ryan D. Etter, #27832-49
KEN NUNN LAW OFFICE
104 South Franklin Road
Bloomington, IN 47404
Phone: (812) 332-9451
Fax: (812) 331-5321
E-mail: ryane@kennunn.com

REQUEST FOR TRIAL BY JURY

Comes now the plaintiff, by counsel, Ken Nunn Law Office, and requests that this matter be tried by jury pursuant to Trial Rule 38.

KEN NUNN LAW OFFICE

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Ryan D. Etter, #27832-49
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104 South Franklin Road
Bloomington, IN 47404
Phone: (812) 332-9451
Fax: (812) 331-5321
E-mail: ryane@kennunn.com

Ryan D. Etter, #27832-49
Ken Nunn Law Office
104 South Franklin Road
Bloomington, IN 47404
Telephone: 812-332-9451
Fax Number: 812-331-5321
Attorney for Plaintiff